

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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Scottsdale Capital Advisors Corp. *et al.*,

Docket No. 1:16-cv-00545

*Plaintiffs*

v.

The Deal, LLC, *et al.*,

*Defendants*

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**PLAINTIFFS' OBJECTION TO DEFENDANTS' MOTION TO DISMISS**

Plaintiffs Scottsdale Capital Advisors Corp. and John Hurry (collectively, "Plaintiffs"), by and through their undersigned counsel, hereby object to Defendants the Deal, LLC ("The Deal") and William Meagher's ("Meagher") (collectively, "Defendants") Motion to Dismiss for lack of personal jurisdiction (the "Motion").

For the reasons described more fully in Plaintiffs' Memorandum of Law in Support of their Objection to Defendants' Motion to Dismiss, Plaintiffs respectfully submit this court has personal jurisdiction of Defendants and their Motion to Dismiss must be denied.

WHEREFORE, Plaintiffs Scottsdale Capital Advisors Corp. and John Hurry respectfully request that this Honorable Court:

- A) Deny Plaintiffs' Motion to Dismiss; or, alternatively,
- B) Grant Defendants leave to conduct jurisdictional discovery; and
- C) Grant such other and further relief as may be just and proper.

Respectfully submitted,

SCOTTSDALE CAPITAL ADVISORS CORP.  
AND JOHN HURRY

By their attorneys  
DEVINE, MILLIMET & BRANCH, P.A.

Dated: February 16, 2017

By: /s/ George Moore  
George R. Moore, Esquire (NH Bar No. 1791)  
111 Amherst Street  
Manchester, NH 03101  
603-669-1000

HARDER, MIRELL & ABRAMS, LLP

Dated: February 16, 2017

By: /s/ Charles Harder  
Charles J. Harder (*pro hac vice*)  
132 South Rodeo Drive, 4th Floor  
Beverly Hills, CA 90212  
424-203-1600

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of February, 2017, I served a copy of the foregoing pleading upon Defendants' counsel in the manner specified herein:

**Electronically served through ECF:**

Elizabeth A. McNamara, Esq. – [lizmcnamara@dwt.com](mailto:lizmcnamara@dwt.com)  
John M. Browning, Esq. - [jackbrowning@dwt.com](mailto:jackbrowning@dwt.com)  
Steven M. Gordon, Esq. – [sgordon@shaheengordon.com](mailto:sgordon@shaheengordon.com)